

UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE

KERRY JOHNSON, et al.

*

Plaintiffs

*

v.

*

Civil Action No. 1:06-cv-408

GEICO CASUALTY COMPANY, et al.

*

Defendants

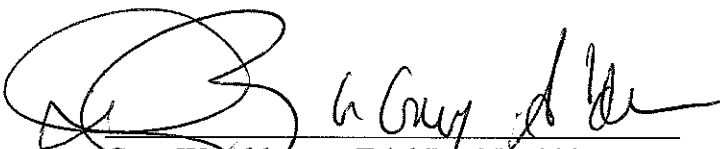
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CLASS ACTION


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**NOTICE OF RULE 30(B)(6) DEPOSITION DUCES TECUM OF
TOUCH OF HEALTH MASSAGE ALLIANCE**

PLEASE TAKE NOTICE that pursuant to FED. R. CIV. P. 30(b)(6), the Defendants will take the deposition upon oral examination of the person designated by Touch of Health Massage Alliance with respect to the topics set forth in Schedule A. The designee shall produce the original documents set forth in Schedule B. The deposition duces tecum will take place on July 16, 2008, commencing at 2:30 p.m., at the offices of LAW OFFICES OF DAWN L. BECKER, 919 N. Market Street, Suite 460, Wilmington, Delaware 19801, or such other date or at such other time or place as may be agreed upon by the parties or ordered by the Court. The deposition will be recorded by stenographic means.



Gary W. Alderson, Trial Bar No. 3895
Dawn L. Becker, Trial Bar No. 2975
LAW OFFICES OF DAWN L. BECKER
Citizens Bank Center
919 N. Market Street
Suite 460
Wilmington, Delaware 19801
302-778-5786
Attorneys for Defendants



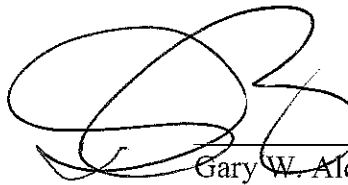
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Attorneys for Defendants
Admitted Pro Hac Vice

CERTIFICATE OF SERVICE

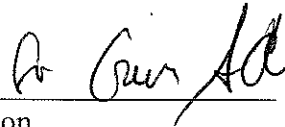
I HEREBY CERTIFY, that on this 3rd day of June, 2008, a copy of the foregoing
was mailed, first class mail, postage prepaid, to:

Richard H. Cross, Jr., Esquire
Christopher P. Simon, Esquire
CROSS & SIMON, LLC
913 North Market Street
11th Floor
P.O. Box 1380
Wilmington, Delaware 19899-1380

Attorneys for Plaintiffs



Gary W. Alderson



SCHEDULE A

TO: Touch of Health Massage Alliance

The deponent is requested to produce a person or persons who are most knowledgeable about and can testify regarding the matters described below:

1. The treatment rendered to Sharon Anderson, DOB: 1/23/63, in 2005.
2. The documentation of treatment rendered to Sharon Anderson in 2005.
3. The billing procedures for the treatment rendered to Sharon Anderson in 2005.
4. The complete billing history related to treatment rendered to Sharon Anderson in 2005, including all billing, invoices, payment records, and explanations of benefits, communications with the patient, attorneys, insurers, collection agencies or credit reporting agencies.
5. The relationship, ownership, affiliation or connection between Faulk Road Physical Therapy, Inc. d/b/a Pro Physical Therapy and Touch of Health Massage Alliance.
6. The method used by Touch of Health Massage Alliance to determine the fees for the treatment rendered to Sharon Anderson in 2005.
7. The methods of determining what treatment modalities to utilize in the care of Sharon Anderson 2005.
8. The identities of all persons who rendered treatment to Sharon Anderson in 2005.
9. The licensure of all persons who provided treatment to Sharon Anderson in 2005.

SCHEDULE B

TO: Touch of Health Massage Alliance

DOCUMENTS TO BE PRODUCED

1. The entire original medical chart for Sharon Anderson.
2. All records related to the complete billing and payment history, including documents related to payments, write-offs, write-downs, Explanations of Benefits, insurance payments, co-pays, collection efforts or referrals for Sharon Anderson.